

# EXHIBIT 2

1  
2  
3 **UNITED STATES DISTRICT COURT**  
4 **NORTHERN DISTRICT OF CALIFORNIA**  
5 **SAN FRANCISCO DIVISION**

6  
7 IN RE: FACEBOOK, INC. CONSUMER  
8 PRIVACY USER PROFILE LITIGATION,

Case No. 3:18-MD-02843-VC

9 This document relates to:

**DECLARATION OF JENNY SHAWVER  
OF ANGEION GROUP, LLC RE:  
CLAIMCLAM COMMUNICATIONS**

10 ALL ACTIONS  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

---

DECLARATION OF JENNY SHAWVER

1 I, Jenny Shawver, declare under penalty of perjury as follows:

2 1. I am a Senior Project Manager at the class action notice and claims administration firm  
3 Angeion Group, LLC (“Angeion”). I am fully familiar with the facts attested to herein based upon my  
4 personal knowledge.

5 2. Attached hereto as **Exhibit A** is true and correct copy of the email exchange I had with Zim  
6 Hang of ClaimClaim, starting on June 14, 2023 and ending on June 30, 2023.

7 I hereby declare under penalty of perjury that the foregoing is true and correct.

8 Dated: July 11, 2023

9   
JENNY SHAWVER

# **EXHIBIT A**

**From:** Jenny Shawver  
**Sent:** Friday, June 30, 2023 5:33 PM  
**To:** Zim Hang  
**Cc:** Risa Neiman; Ryan Chumley  
**Subject:** RE: Case manager for FB User Privacy settlement?

Dear Mr. Hang,

Thank you for your email. We have consulted with Counsel for the parties and, absent a Court order, cannot accept the claims submitted from ClaimClam because they still provide your information, and not the claimants', in the payment field. As such, the claims are still not in compliance with Paragraph 98 of the Settlement Agreement. We are not aware whether the settlement agreement in Ocwen that you direct us to has a similar provision.

To be clear, Counsel has made clear that they want to ensure that all class members interested in participating in the settlement submit claims. They have instructed us to provide all necessary assistance at no charge to any claimant who requests it. For that reason, when you send the communication to your clients on June 30, we ask that you include the following:

*Submitting claims in this settlement is simple and free, and submitting the claim yourself will maximize your own recovery. In order to submit your claim, please go to the settlement website, <https://facebookuserprivacysettlement.com>, and click the link at the top of the screen to "Submit Claim." On that page, you will be asked to provide basic information in order to submit your claim. It should only take a few minutes. If you need assistance with your claim, you may contact the settlement administrator via the "Contact" page on the settlement website. You will not be asked to pay anything to get assistance from the settlement administrator or to submit your claim.*

Thank you,

**Jenny Shawver**  
Senior Project Manager  
Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
267-996-3847 (D)  
215-525-0209 (F)  
[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)  
[www.angeiongroup.com](http://www.angeiongroup.com)



**AG | ANGEION GROUP**  
Changing the Rules

---

**From:** Zim Hang <[zim@getclaimclam.com](mailto:zim@getclaimclam.com)>  
**Sent:** Friday, June 23, 2023 9:39 AM  
**To:** Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)>  
**Cc:** Risa Neiman <[rneiman@angeiongroup.com](mailto:rneiman@angeiongroup.com)>  
**Subject:** Re: Case manager for FB User Privacy settlement?

[EXTERNAL]

Hi Jenny,

Thank you for your response.

Pursuant to Paragraph 99 of the Settlement Agreement, we would like to contest the rejection of our submitted claims.

Regarding the Settlement Administrator's provided reasons for rejection of our client's claims, I am re-submitting the Claim Forms with amendments (see attached) to address #1 and #3 of the Settlement Administrator's stated reasons:

*First, the Claim Forms you seek to submit would be submitted by you, rather than Settlement Class Members as required by the Settlement.*

*Third, you have signed the verification and attestation, swearing under penalty of perjury that you are the Settlement Class Member claiming Settlement Benefits, whereas the Settlement requires that Claim Forms be signed and verified by Settlement Class Members.*

Please observe in the attached Claim Forms that the re-submitted claims now have our clients' information in the forms, including their signed and dated verification and attestation.

Regarding the Settlement Administrator's second reason for rejection of agent-submitted claims:

*Second, the contact and payment information provided in the Claim Form is that of Communion, Inc., rather than that of the claimant as required by the Settlement.*

I have written to Class Counsel (and copied you and Risa), in hopes of directly resolving the issue concerning this point.

Regarding your demand, we will comply and plan to notify all of our clients with valid claims to file a Claim Form at <https://www.facebookuserprivacysettlement.com/#submit-claim>, even though the Settlement Administrator has no authority to make such a demand nor do we have any obligation to comply. We find the demand to be aggressive and contradictory, as in the Settlement Administrator's rejection of our submitted claims is a refusal to recognize the principal-agent relationship we have established with our clients, and yet the Settlement Administrator simultaneously burdens us with a demand that relies on the validity of said relationship.

In the interest of transparency, please note that in the event the rejection of agent-submitted claims remains standing and we send out Settlement Administrator's requested notice to our clients, we plan to include in our notice these additional materials in order to keep our clients informed of the current developments, and to represent to them their rights and their options with respect to such rights:

- A copy of your email response, with emphasis on the Settlement Administrator's cited reasons for rejection of claims submitted by agents.
- Our position and opinion on the Settlement Administrator's rejection of claims
- Directions and URL for opt-outs (at <https://www.facebookuserprivacysettlement.com/#opt-out>)
- Directions and URL for objections (at <https://angeion->

[public.s3.amazonaws.com/www.facebookuserprivacysettlement.com/docs/Facebook%20User%20Privacy%20Objection%20Form%20Final.pdf](https://public.s3.amazonaws.com/www.facebookuserprivacysettlement.com/docs/Facebook%20User%20Privacy%20Objection%20Form%20Final.pdf))

I firmly believe that the goals of our organization are fully aligned with that of Class Counsel and the Class Members, and we have every intention to collaborate with the Settlement Administrator. I respectfully encourage you to confer with Class Counsel and allow Class Members to retain representation and to submit claims through their agent. I would much prefer to be helping Class Members than to be writing long emails.

I appreciate your time and consideration.

Sincerely,

Zim

On Wed, Jun 14, 2023 at 5:47 PM Jenny Shawver <[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)> wrote:

Dear Mr. Hang,

I write in response to your inquiry about submitting approximately 1,000 claims on behalf of Settlement Class Members in the proposed settlement in the *In Re: Facebook, Inc. Consumer Privacy User Profile Litigation*.

As the Settlement Administrator appointed by the Court, we are bound by the terms of the proposed Settlement Agreement, which is available here:

<https://www.facebookuserprivacysettlement.com/#important-documents>. Paragraph 97 of the Settlement provides that a Claim Form must be rejected if it “does not substantially comply with the formal requirements set forth in this Settlement and/or in the Claim Form instructions. In turn, Paragraph 92 of the Settlement provides that “Settlement Class Members who wish to receive a cash payment will be required to submit a Claim Form,” which requires Settlement Class Members to provide contact information and respond to requests for information regarding their use of Facebook during the Class Period, as well as “selection of form of payment, and verification of the information provided.” Similarly, Section IV of the Claim Form requires claimants to “swear under penalty of perjury that [they are] the person identified [in the Claim Form] and the information provided in [the] Claim Form is true and correct.”

We reviewed exemplars of the Claim Forms that you would like to submit, and we will not be able to accept them. First, the Claim Forms you seek to submit would be submitted by you, rather than Settlement Class Members as required by the Settlement. Second, the contact and payment information provided in the Claim Form is that of Communion, Inc., rather than that of the claimant as required by the Settlement. Third, you have signed the verification and attestation, swearing under penalty of perjury that you are the Settlement Class Member claiming Settlement Benefits, whereas the Settlement requires that Claim Forms be signed and verified by Settlement Class Members. In these regards, the Claim Forms you seek to submit are not acceptable, as they do not “substantially comply with the formal requirements set forth in this Settlement and/or in the Claim Form instructions” as required by Paragraph 97 of the Settlement Agreement. Likewise, Paragraph 98 of the Settlement provides that the Settlement Administrator may reject a Claim Form if “the person submitting the Claim Form is not a Settlement Class Member,” or “the person submitting the Claim Form requests that payment be made to a person or entity other than the Settlement Class Member for whom the Claim Form is submitted,” both of which are at issue here.

We believe it is important that the approximately 1,000 individuals who are relying on ClaimClam to submit Claim Forms in this Settlement receive the above information. **We therefore ask that you promptly contact**

**all of these individuals to let them know that ClaimClaim will not be able to submit claims on their behalf in the proposed settlement in the *In Re: Facebook, Inc. Consumer Privacy User Profile Litigation*, and that if they are eligible to participate in the Settlement they should file a Claim Form at <https://www.facebookuserprivacysettlement.com/#submit-claim> by the deadline of August 25, 2023 at 11:59 PT.** We also ask that you confirm in writing that you have contacted all of these individuals no later than Friday, June 30, 2023.

Please let us know if you have any questions.

Best regards,

**Jenny Shawver**

*Senior Project Manager*

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia, PA 19103

267-996-3847 (D)

215-525-0209 (F)

[jshawver@angeiongroup.com](mailto:jshawver@angeiongroup.com)

[www.angeiongroup.com](http://www.angeiongroup.com)



**AG | ANGEION GROUP**  
Changing the Rules